



UST and SAF Bulletin

Arizona Department of Environmental Quality

Subject: Common UST Technical Report Deficiencies

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TYPE

Common UST Technical Report Deficiencies

BACKGROUND

- Arizona Revised Statutes §49-1005
- Arizona Administrative Code - Title 18, Chapter 12, Articles 1 and 2

The Underground Storage Tank Corrective Action Section receives and reviews technical documents including Site Characterization Reports, Corrective Action Plans, and LUST Case Closure Reports. Occasionally, these documents contain a deficiency that prevents approval by ADEQ. This bulletin contains a list of the most common deficiencies for each type of document.

CONTENT

Please see attached guidance

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**ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY
UNDERGROUND STORAGE TANK PROGRAM**

COMMON REPORT DEFICIENCIES *

Site Characterization Report (SCR)

- Extent of soil/groundwater/free product not defined (vertically, horizontally)
- Does not address all chemicals of concern (COCs) or inappropriate analyses performed
- Did not provide complete SCR (missing figures, data, etc.)
- Conceptual site model (CSM) is inadequate
- Insufficient information of potential receptors
- Failed to address or adequately address preferential pathways
- Monitor wells are not properly screened
- Wrong standards were applied (soil remediation standards (SRLs), health based guidance levels (HBGLs) or groundwater protection levels (GPLs.)
- SCR contains out dated data
- No rationale for soil borings/monitor well placement
- Inadequate or missing descriptions/conclusions/profession interpretation
- Undocumented descriptions about site conditions

Corrective Action Plan (CAP)

- Remediation strategy(ies) is/are not adequately documented
- Inadequate or missing schedule of activities and completion
- Does not address all chemical of concern (COCs)
- Inadequate or missing risk/exposure assessment
- Inappropriate technology (too protective/not protective enough)
- Missing or inadequate comparison of three alternatives
- Site is not adequately characterized (soil/groundwater/free product), or missing data
- CAP does not address all permit requirements
- No mass balance estimate of contaminants in soil and groundwater
- Insufficient or out dated groundwater data

LUST Case Closure Report

- All chemicals of concern (COCs) not addressed (i.e. MTBE)
- Insufficient groundwater verification data
- Confirmation soil borings not installed in appropriate locations or to appropriate depths
- Site not remediated to below applicable clean-up standards
- Administratively incomplete (owner/operator certification statement, DEUR not filed, etc.)
- Inadequate remediation progress reports
- Wrong standards were identified (soil remediation standards (SRLs), health based guidance levels (HBGLs) or groundwater protection levels (GPLs.)

*** This list of common report deficiencies may not include every report deficiency as determined by ADEQ, and was created to be used solely as a customer service document. For the purpose of this list, ADEQ used subjective terms such as: insufficient, inadequate, etc. The actual LUST case letters provide site specific descriptions about what information is needed. This list will be updated periodically by ADEQ, as necessary.**